

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

NOV 02 2016

UNITED STATES OF AMERICA

v.

ALEX GUZMAN, (1)
HECTOR TROCHE, (2)
SUSANA FLORES, (3)
JUAN RINCON VELASQUEZ, (4)
LARRY ROBERTS, (5)
TRINIDAD UGALDE-PEREZ, (6)

§
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§
§
§
§
§

BY
DEPUTY _____
No. 1:16CR 91
Judge Clark-Giblin

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846
(Conspiracy to Possess with the Intent to
Distribute a Controlled Substance
(Cocaine HCL)).

That from on or about sometime in the late 2000's, the exact date being unknown to the Grand Jury, and continuing thereafter until August 30, 2012, in the Eastern District of Texas and elsewhere, **Alex Guzman** and **Hector Troche**, defendants, knowingly and intentionally conspired and agreed with each other, and with persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute five hundred (500) grams or more but less than five (5) kilograms of a Schedule II controlled substance, namely, a mixture or substance containing a detectable amount of cocaine, in violation of 21 U.S.C. § 841(a)(1).

All in violation of 21 U.S.C. § 846.

Count Two

Violation: 21 U.S.C. § 846
(Conspiracy to Possess with the Intent to
Distribute a Controlled Substance
(Marijuana)).

That from on or about sometime in the late 2000's, the exact date being unknown to the Grand Jury, and continuing thereafter until July 23, 2013, in the Eastern District of Texas and elsewhere, **Susana Flores, Juan Rincon Velasquez, Larry Roberts, and Trinidad Ugalde-Perez**, defendants, knowingly and intentionally conspired and agreed with each other, and with persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute one hundred (100) kilograms or more but less than one thousand (1,000) kilograms of marijuana of Schedule I controlled substance, namely, a mixture or substance containing a detectable amount of marijuana, in violation of 21 U.S.C. § 841(a)(1).

All in violation of 21 U.S.C. § 846.

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE
Criminal Forfeiture Pursuant to 21 U.S.C. §§ 853 and 881

Upon conviction of the controlled substance offenses alleged in Counts One, Two and Three of this second superseding indictment, **Alex Guzman, Hector Troche, Susana Flores, Juan Rincon Velasquez, Larry Roberts, and Trinidad Ugalde-Perez**, defendants, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained directly, or indirectly, as a result of the said violation, and any property used, or intended to be used in any manner or part, to

commit or to facilitate the commission of the said violation, including but not limited to the following:

MONEY JUDGMENT

1. A sum of money equal to one-hundred thirty-two thousand three hundred fifty dollars (\$132,350) in United States currency, representing the amount of proceeds obtained as a result of the offense alleged in Count One, conspiracy to distribute and to possess with the intent to distribute five hundred (500) grams or more but less than five (5) kilograms of a Schedule II controlled substance, namely, a mixture or substance containing a detectable amount of cocaine, for which the defendants are jointly and severally liable.
2. A sum of money equal to one-hundred thousand dollars (\$100,000) in United States currency, representing the amount of proceeds obtained as a result of the offense alleged in Count Two, conspiracy to distribute and to possess with the intent to distribute one thousand (1,000) kilograms or more of Schedule I controlled substance, namely, a mixture or substance containing a detectable amount of marijuana, for which the defendants are jointly and severally liable.

If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty.

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendants up to the value of the forfeitable property described above.


By virtue of the commission of the felony offense charged in this indictment by the defendants any and all interest the defendants have in the above-described properties is vested in the United States and hereby forfeited to the United States pursuant to 21 U.S.C. § 853 and/or 881.

A TRUE BILL



GRAND JURY FOREPERSON

BRIT FEATHERSTON
ACTING UNITED STATES ATTORNEY



CHRISTOPHER RAPP
Assistant United States Attorney

11/2/2016

Date

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FOR THE EASTERN DISTRICT OF TEXAS
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UNITED STATES OF AMERICA	§	
	§	No. 1:16CR <u>91</u>
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	§	
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LARRY ROBERTS, (5)	§	
TRINIDAD UGALDE-PEREZ, (6)	§	

NOTICE OF PENALTY

Count One

Violation: 21 U.S.C. §§ 841(b) and 846

Penalty: If 500 grams or more, but less than 5 kilograms of cocaine - imprisonment of not less than 5 years, but not more than 40 years, a fine not to exceed \$5 million, or both, and supervised release of at least 4 years, but not more than life;

If less than 500 grams of cocaine - not more than 20 years imprisonment, a fine not to exceed \$1 million, or both, and supervised release of at least 3 years, but not more than life.

Special Assessment: \$ 100.00

Count Two

Violation: 21 U.S.C. §§ 841(b) and 846

Penalty: (Marijuana)

If 100 kilograms or more, but less than 1,000 kilograms of marijuana - imprisonment of not less than 5 years, but not more than 40 years, a fine not to exceed \$5 million, or both, and supervised release of at least 4 years, but not more than life;

If 50 kilograms or more, but less than 100 kilograms of marijuana - not more than 20 years imprisonment, a fine not to exceed \$1 million, or both, and supervised release of at least 3 years, but not more than life.

If less than 50 kilograms of marijuana - not more than 5 years imprisonment, a fine not to exceed \$250,000, or both, and supervised release of at least 2 years, but not more than life.

Special Assessment: \$ 100.00